
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Erica Lindsay Lee

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

Andrew Yang

Do you want a jury trial?

☒ Yes ☐ No

Friends of Andrew Yang

Write the full name of each defendant. The names listed above must be identical to those contained in Section I.

EMPLOYMENT DISCRIMINATION COMPLAINT

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. PARTIES**A. Plaintiff Information**

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Erica	L	Lee
First Name	Middle Initial	Last Name
10732 8th Ave NE Apt 4		
Street Address		
King County, Seattle	WA	98125
County, City	State	Zip Code
(916) 316-2541	ericalindsaylee@gmail.com	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. (Proper defendants under employment discrimination statutes are usually employers, labor organizations, or employment agencies.) Attach additional pages if needed.

Defendant 1:	Andrew Yang		
	Name		
	650 West 42nd Street Apt 3112		
	Address where defendant may be served		
	New York County, New York City	NY	10036-4387
	County, City	State	Zip Code
Defendant 2:	Friends of Andrew Yang		
	Name		
	P.O. Box 214 Midtown Station		
	Address where defendant may be served		
	New York County, New York City	NY	10018
	County, City	State	Zip Code

Defendant 3:

 Name

 Address where defendant may be served

 County, City

State

Zip Code

II. PLACE OF EMPLOYMENT

The address at which I was employed or sought employment by the defendant(s) is:
Friends of Andrew Yang - New York Headquarters

 Name

 214 West 39th Street Suite 404

 Address

 New York County, New York City NY

10018

 County, City

State

Zip Code

III. CAUSE OF ACTION**A. Federal Claims**

This employment discrimination lawsuit is brought under (check only the options below that apply in your case):

- ☒ **Title VII of the Civil Rights Act of 1964**, 42 U.S.C. §§ 2000e to 2000e-17, for employment discrimination on the basis of race, color, religion, sex, or national origin

The defendant discriminated against me because of my (check only those that apply and explain):

- ☐ race: _____
- ☐ color: _____
- ☐ religion: _____
- ☒ sex: harassment/hostile work environment/retaliation
- ☐ national origin: _____

- ☐ **42 U.S.C. § 1981**, for intentional employment discrimination on the basis of race

My race is: _____

- ☐ **Age Discrimination in Employment Act of 1967**, 29 U.S.C. §§ 621 to 634, for employment discrimination on the basis of age (40 or older)

I was born in the year: _____

- ☐ **Rehabilitation Act of 1973**, 29 U.S.C. §§ 701 to 796, for employment discrimination on the basis of a disability by an employer that constitutes a program or activity receiving federal financial assistance

My disability or perceived disability is: _____

- ☐ **Americans with Disabilities Act of 1990**, 42 U.S.C. §§ 12101 to 12213, for employment discrimination on the basis of a disability

My disability or perceived disability is: _____

- ☐ **Family and Medical Leave Act of 1993**, 29 U.S.C. §§ 2601 to 2654, for employment discrimination on the basis of leave for qualified medical or family reasons

B. Other Claims

In addition to my federal claims listed above, I assert claims under:

- ☒ **New York State Human Rights Law**, N.Y. Exec. Law §§ 290 to 297, for employment discrimination on the basis of age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status
- ☒ **New York City Human Rights Law**, N.Y. City Admin. Code §§ 8-101 to 131, for employment discrimination on the basis of actual or perceived age, race, creed, color, national origin, gender, disability, marital status, partnership status, sexual orientation, alienage, citizenship status
- ☒ Other (may include other relevant federal, state, city, or county law):

New York State Executive Law

IV. STATEMENT OF CLAIM

A. Adverse Employment Action

The defendant or defendants in this case took the following adverse employment actions against me (check only those that apply):

- ☐ did not hire me
- ☒ terminated my employment
- ☐ did not promote me
- ☐ did not accommodate my disability
- ☒ provided me with terms and conditions of employment different from those of similar employees
- ☒ retaliated against me
- ☒ harassed me or created a hostile work environment
- ☐ other (specify): _____

B. Facts

State here the facts that support your claim. Attach additional pages if needed. You should explain what actions defendants took (or failed to take) *because of* your protected characteristic, such as your race, disability, age, or religion. Include times and locations, if possible. State whether defendants are continuing to commit these acts against you.

I worked for Defendants, FOAY and Andrew Yang (2020 presidential candidate), from June 2019 until I was terminated on September 28, 2019. The discrimination, hostile work environment, and retaliation, including retaliatory harassment, was ongoing from June 25, 2019, through June 1, 2021. Defendants were aware of my opposition at all times. Defendants had the ability to take correction action, but failed to do so. In May 2019, I discovered a Facebook page monitored and controlled by Defendants. This Facebook page contained offensive language, including demeaning and degrading comments about women, and demeaning degrading pictures of women. Many women, including myself, reported the contents of this Facebook page to Defendants, including Kayle Jellesma and Shaun Looney. On July 9, 2019, the position I held was Yang Gang Regional Organizer (YGRO) for Washington State, and I was promised compensation for my services by Defendants. Defendants controlled the manner in which I did my work. On October 20, 2019, a new position was offered to me by the Defendants. On countless occasions, I reported sexual harassment, a hostile work environment, and retaliation against me. On October 1, 2019, I was promised by presidential candidate Andrew Yang that the appropriate action would be taken with respect to all of my complaints. To this day, that promise to take the appropriate action has not been fulfilled.

As additional support for your claim, you may attach any charge of discrimination that you filed with the U.S. Equal Employment Opportunity Commission, the New York State Division of Human Rights, the New York City Commission on Human Rights, or any other government agency.

V. ADMINISTRATIVE PROCEDURES

For most claims under the federal employment discrimination statutes, before filing a lawsuit, you must first file a charge with the U.S. Equal Employment Opportunity Commission (EEOC) and receive a Notice of Right to Sue.

Did you file a charge of discrimination against the defendant(s) with the EEOC or any other government agency?

☒ Yes (Please attach a copy of the charge to this complaint.)

When did you file your charge? 07/21/20

☐ No

Have you received a Notice of Right to Sue from the EEOC?

☒ Yes (Please attach a copy of the Notice of Right to Sue.)

What is the date on the Notice? 06/17/21

When did you receive the Notice? 06/24/21

☐ No

VI. RELIEF

The relief I want the court to order is (check only those that apply):

☐ direct the defendant to hire me

☐ direct the defendant to re-employ me

☐ direct the defendant to promote me

☐ direct the defendant to reasonably accommodate my religion

☐ direct the defendant to reasonably accommodate my disability

☒ direct the defendant to (specify) (if you believe you are entitled to money damages, explain that here)


\$500,000 and written apology

VII. PLAINTIFF'S CERTIFICATION

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

09/22/21			
Dated		Plaintiff's Signature	
Erica	L	Lee	
First Name	Middle Initial	Last Name	
10732 8th Ave NE Apt 4			
Street Address			
King County, Seattle	WA	98125	
County, City	State	Zip Code	
(916) 316-2541	ericalindsaylee@gmail.com		
Telephone Number	Email Address (if available)		

I have read the attached Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



**United States District Court
Southern District of New York**

Pro Se (Nonprisoner) Consent to Receive Documents Electronically

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER¹ at www.pacer.uscourts.gov or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one "free look" at the document by clicking on the hyperlinked document number in the e-mail.² Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first "free look" or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the "free look" to avoid future charges.*

IMPORTANT NOTICE

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court's Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your "free look" and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.³

¹ Public Access to Court Electronic Records (PACER) (www.pacer.uscourts.gov) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

² You must review the Court's actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

³ The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk's Office at the Court.

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

n/a

Lee, Erica L

Name (Last, First, MI)

10732 8th Ave NE #4 Seattle

WA

98125

Address City

State

Zip Code

(916) 316-2541

ericalindsaylee@gmail.com

Telephone Number

E-mail Address

09/22/21

Erica Lee

Date

Signature

Return completed form to:

Pro Se Intake Unit (Room 200)
500 Pearl Street
New York, NY 10007

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 520-2020-03281	
NEW YORK STATE DIVISION OF HUMAN RIGHTS and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) MS. ERICA L LEE		Home Phone (916) 316-2541	Year of Birth
Street Address City, State and ZIP Code 10732 8TH AVE NE, APT 4, SEATTLE, WA 98125			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name FRIENDS OF ANDREW YANG COMMITTEE 2020 CAMPAIGN		No. Employees, Members Unknown	Phone No. (917) 541-6183
Street Address City, State and ZIP Code 214 W 39TH STREET, SUITE 404, NYC, NY 10018			
Name		No. Employees, Members	Phone No.
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 09-28-2019 09-28-2019 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I am a woman who worked for Respondent as a Regional organizer for Washington state from July of 2019 until I was terminated on September 28, 2019. In May 2019, I discovered a Facebook page monitored and controlled by Respondent engaged in offensive sexist comments towards women. I reported the offensive comments to both Kayle Cooper and Shaun Looney. I was hired in July 2019, and promised a salary for my services. Respondent controlled the manner in which I did my work. After I reported the content from the Facebook page, the sexist posts did not stop and Respondent took no action to control the content on this site. As a result of complaining, employees of Respondent began to harass me for speaking up about sexist comments sanctioned by Respondent. I went public on Twitter with my treatment by Respondent. Respondent was aware of my opposition. Despite putting me in contact with officials to address my concerns of retaliatory harassment no corrective action was taken. Respondent had the ability to take corrective action. As a result of complaining, I was publicly discharged on Twitter on or around September 28, 2019. In a further act of retaliation, my personal contact information was published by a close friend of Respondent.			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
Digitally signed by Erica Lee on 07-21-2020 11:17 AM EDT		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

EEOC Form 5 (11/09)

<p style="text-align: center;">CHARGE OF DISCRIMINATION</p> <p style="font-size: small;">This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>	<p>Charge Presented To: Agency(ies) Charge No(s):</p> <p> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </p> <p style="text-align: right; font-weight: bold; font-size: large;">520-2020-03281</p>
<p>NEW YORK STATE DIVISION OF HUMAN RIGHTS and EEOC</p> <p style="font-size: x-small;"><i>State or local Agency, if any</i></p>	
<p>I allege I was subjected to sex discrimination, hostile work environment and retaliation in violation of Title VII of the Civil Rights Act of 1964, as amended.</p>	

<p>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p>	<p>NOTARY – <i>When necessary for State and Local Agency Requirements</i></p>
<p>I declare under penalty of perjury that the above is true and correct.</p> <p style="margin-top: 20px;">Digitally signed by Erica Lee on 07-21-2020 11:17 AM EDT</p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p> <p>SIGNATURE OF COMPLAINANT</p> <p style="margin-top: 20px;">SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE <i>(month, day, year)</i></p>

CP Enclosure with EEOC Form 5 (11/09)

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge if **retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation,

proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Erica L. Lee**
10732 8th Ave NE
Apt 4
Seattle, WA 98125

From: **New York District Office**
33 Whitehall Street
5th Floor
New York, NY 10004

☐

On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

520-2020-03281

Perry Canales,
Investigator

(929) 506-5318

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

☐

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.

☐

Your allegations did not involve a disability as defined by the Americans With Disabilities Act.

☐

The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.

☐

Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge

☐

The EEOC issues the following determination: The EEOC will not proceed further with its investigation, and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

☐

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.

☒

Other (briefly state)

No Employee/Employer relationship

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Enclosures(s)

For

6/17/2021

Judy A. Keenan,
District Director

(Date Issued)

cc:

Kara Ariail
Ms.
Holland & Knight LLP
1650 TYSONS BLVD
STE 1700
Tysons, VA 22102

INFORMATION RELATED TO FILING SUIT UNDER THE LAWS ENFORCED BY THE EEOC

*(This information relates to filing suit in Federal or State court under Federal law.
If you also plan to sue claiming violations of State law, please be aware that time limits and other
provisions of State law may be shorter or more limited than those described below.)*

PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA), the Genetic Information Nondiscrimination Act (GINA), or the Age Discrimination in Employment Act (ADEA):

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope or record of receipt, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was issued to you** (as indicated where the Notice is signed) or the date of the postmark or record of receipt, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit **before 7/1/10** -- *not* 12/1/10 -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

Enclosures(s)

cc:

1. Erica was promised compensation for her services by Defendant, FOAY (Friends of Andrew Yang aka Yang 2020). **(EXHIBITS K and N)**

(EEOC investigator Perry Canales failed to properly consider supporting documents **(EXHIBITS K and N)**. Perry Canales is no longer with the EEOC.)

2. Volunteer service with FOAY **(EXHIBIT M)** regularly led to employment with the campaign, and, therefore, Erica should be considered an employee for purposes of the EEO statutes. (EEOC investigator, Perry Canales, failed to address.)

Unpaid volunteers or interns may be considered employees if the volunteer work is required for regular employment, or regularly leads to paid employment with the same employment institution. The volunteer service is not a prerequisite to employment, but former volunteers are given preferential treatment when competing for vacancies. (A list of FOAY volunteers who were later hired by the campaign is provided.) **(EXHIBIT M)**

3. Due to the Defendants' actions and lack of action, Erica endured ongoing sexual harassment, a hostile work environment, retaliation, and severe emotional distress. **(EXHIBITS C through N)**

*Note: For the purposes of this document, the color designation is as follows:

FOAY Staff, FOAY volunteers, Erica (Plaintiff), Alyssa Milano (Celebrity)

EXHIBIT A

February 23, 2019: Erica follows Andrew Yang on Twitter.

April 11, 2019: Erica makes her first campaign donation to Andrew Yang for President.

May 2019: Erica joins the Andrew Yang Basecamp Facebook group. She responds to volunteer moderator Fred Ramey's sexist comments.

May 3, 2019: Erica attends Andrew Yang for President rally at Seattle Gasworks Park.

June 6, 2019: Erica attends Seattle Grassroots Fundraiser for Andrew Yang; pays \$75.00.

EXHIBIT B

Relevant Timeline: Details to follow beginning page 7.

(Note: Ms. Kara Ariail, counsel for FOAY, in her EEOC responses dated March 22, 2021, and June 1, 2021, respectively, claims that Erica was removed from the campaign in “August 2019,” and sometime before “September 20, 2019.”)

*Note: My termination from the campaign was on September 28, 2019, NOT in August of 2019 and NOT sometime before September 20, 2019. Basic facts were mangled by Ms. Kara Ariail.

EXHIBIT C

June 8, 2019: Erica onboarded

June 9, 2019: Onboarding requirements completed by Erica

June 10-25, 2019: Erica waiting for response from Kayle Jellesma

June 25, 2019: Erica sends message to Kayle Jellesma asking about moderators for Basecamp

June 25, 2019: Kayle Jellesma replies

June 29, 2019: Kayle Jellesma thanks Erica for everything she's done

July 3, 2019: Andi Duncan contacts Erica to interview her for YGRO

July 6, 2019: Andi Duncan contacts Erica to schedule an interview

July 9, 2019: Erica hired as YGRO

July 13, 2019: Anaami P. congratulates Erica on becoming YGRO

August 20, 2019: Shane Thrapp invites Erica to join @ YangGangHub

August 21, 2019: Shane Thrapp calls Erica; 90-minute call to discuss improvements

August 22, 2019: Shane Thrapp apologizes to Erica

August 24, 2019: Shane Thrapp sends message to Erica ("Your issue is being looked at by the campaign.")

August 24, 2019: Shaun Looney asks Erica for call; provides phone number

August 27, 2019: Shaun Looney tells Erica, "I won't tolerate any of that behavior"

September 9, 2019: Erica sends email to Shaun Looney

***29 days**

September 25, 2019: Erica messages Shaun Looney; asks him to elevate harassment complaints to HR

September 25, 2019: Erica contacts Steve Marchand to report harassment

September 25, 2019: Erica sends second message to Steve Marchand

September 25, 2019: Erica sends third message to Steve Marchand

September 25, 2019: Shaun Looney emails Erica with cc to Christine Nbemeneh, HR representative

September 26, 2019: Christine Nbemeneh responds

September 26, 2019: Shane Thrapp states, "The campaign is fully involved in this and they have been for months"

September 26, 2019: Erica sends fourth message to Steve Marchand

September 26, 2019: David Barnes sends aggressive message to Erica

September 27, 2019: Shane Thrapp's harassment of Erica is mentioned on Twitter

September 28, 2019: Erica asks about deactivated Slack account

***September 28, 2019: Morgan Rudman publicly tweets about Erica's termination from campaign**

September 28, 2019: Blacklist appears/referenced on Twitter and Discord

September 28, 2019: Erica speaks with Katie Dolan

September 28, 2019: Erica texts Carly Reilly

September 29, 2019: Shane Thrapp's behavior is discussed on Twitter

September 29, 2019: David Barnes doxxes Erica

September 29, 2019: Letter to Andrew Yang written

*October 1, 2019: Andrew Yang and Erica speak on phone for 12 minutes

October 1, 2019: Shane Thrapp announces in Discord he has been asked to leave the campaign

October 2, 2019: Alyssa Milano delivers letter to Andrew Yang

October 4, 2019: Erica sends text message to Andrew Yang

October 4, 2019: Erica receives text reply from Andrew Yang

October 4, 2019: Matt Shinnors calls Erica

October 4, 2019: Erica emails Matt Shinnors

October 4, 2019: Matt Shinnors responds

October 5, 2019: David Barnes doxxes Erica second time

October 6, 2019: Erica emails report to Matt Shinnors

October 7, 2019: Matt Shinnors emails Erica

October 18, 2019: Drew Corbitt sends text to Erica

October 20, 2019: Drew Corbitt asks Erica if harassment is still continuing

October 20, 2019: Drew Corbitt offers Erica a new position that "would get you out of that sphere"

December 10, 2019: Alyssa Milano

EXHIBIT D

*On **March 22, 2021**, Ms. Kara Ariail, partner at Holland & Knight, submitted the following statement to the EEOC on behalf of her client, FOAY:

"After she was removed from the campaign, Charging Party took a number of adverse actions against FOAY. She aired her complaints on Twitter, engaged in name-calling of FOAY employees and volunteers, emailed a celebrity supporter and under false pretenses (since acknowledged by the celebrity), convinced her to pull out of a campaign fundraiser, and made repeated attempts to persuade news media outlets to report on her complaints."

Ms. Ariail's EEOC responses are riddled with inaccuracies (including a fictitious timeline of events), which is alarming. Even more alarming is the fact that her responses contained outright falsehoods. The most egregious, so far, is the statement highlighted in yellow (see above). The "celebrity supporter" is **Alyssa Milano**. **Erica** absolutely did not contact **Ms. Milano** under false pretenses, nor did **Erica** convince **Ms. Milano** to pull out of a campaign fundraiser. These allegations are absolutely false. (EXHIBIT L)

The following is a statement, dated June 1, 2021, submitted to the EEOC by Ms. Ariail. It is absolutely false that "there was no formal recruiting or onboarding process for volunteer positions..." EXHIBITS E and F show the recruitment and onboarding process. FOAY, and Ms. Ariail, are fully aware that this process did in fact exist. This is just one of a number of examples of misrepresentation and outright falsehoods put forth by FOAY and Ms. Ariail.

Response to Request No 4:

FOAY does not have records responsive to Request 4 a-c because there was no formal recruiting or onboarding process for volunteer positions, which tended to be fluid and subject to change depending on the needs of the campaign. All information currently available to FOAY that is responsive to Request 4.d is included in Appendix A to these Responses.

Candidly, **Erica** believes FOAY has wilfully engaged in repeated attempts to discredit her by submitting documents containing misrepresentations and false statements. Ms. Ariail, as counsel for FOAY, had ample opportunity to confirm the truth and/or accuracy of many of these statements. Clearly, she failed to do so. A grievance against Ms. Ariail will be filed in the near future.



TheMonkofRa
@MonkofRa

Replying to @WarriorWomen4Y and @AndrewYang

Definitely agree with all this, court is exhausting.
Really wish everything was handled properly. When
**Erica was on Yangs side it was a boon. Without her in
2024 will be a bane.**

2:57 PM · May 8, 2020 · Twitter for Android

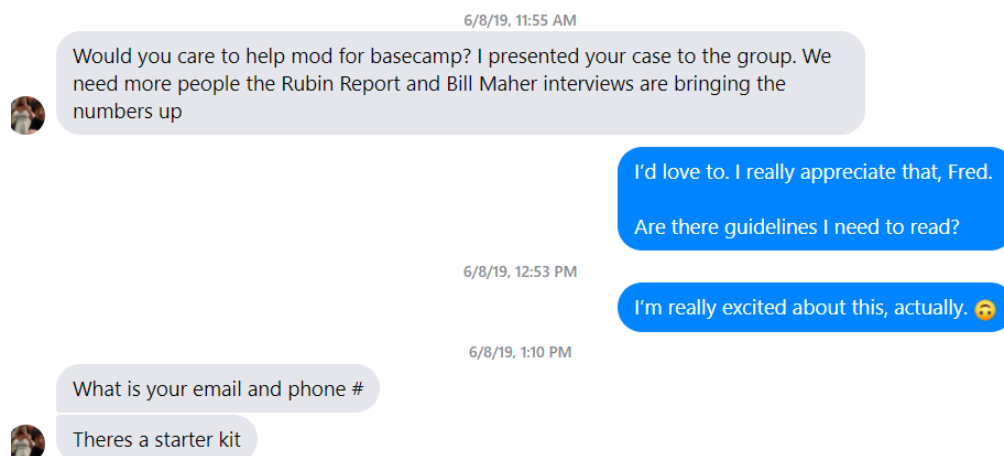
Erica had done everything humanly possible to have these matters resolved outside of a public forum. Unfortunately, the filing of this complaint is necessary.

EXHIBIT E

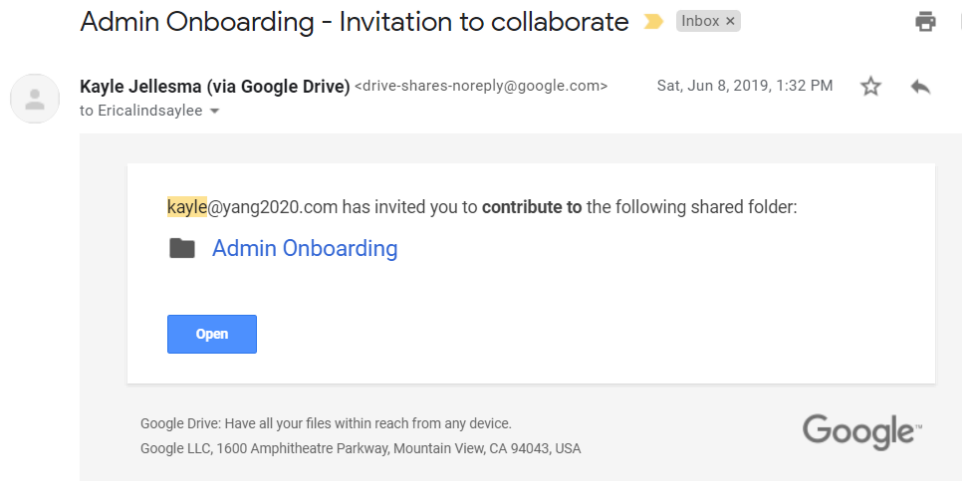
The following is a **true and accurate representation** of the sequence of events. Evidence, including screenshots of emails, text messages, social media correspondence, etc., is attached to this document. Please note that dates and times have been included.

***Relevant time period:**

June 8, 2019, at approximately 11:55am PT: Volunteer Basecamp moderator, **Fred Ramey**, sends **Erica** a Facebook direct message.

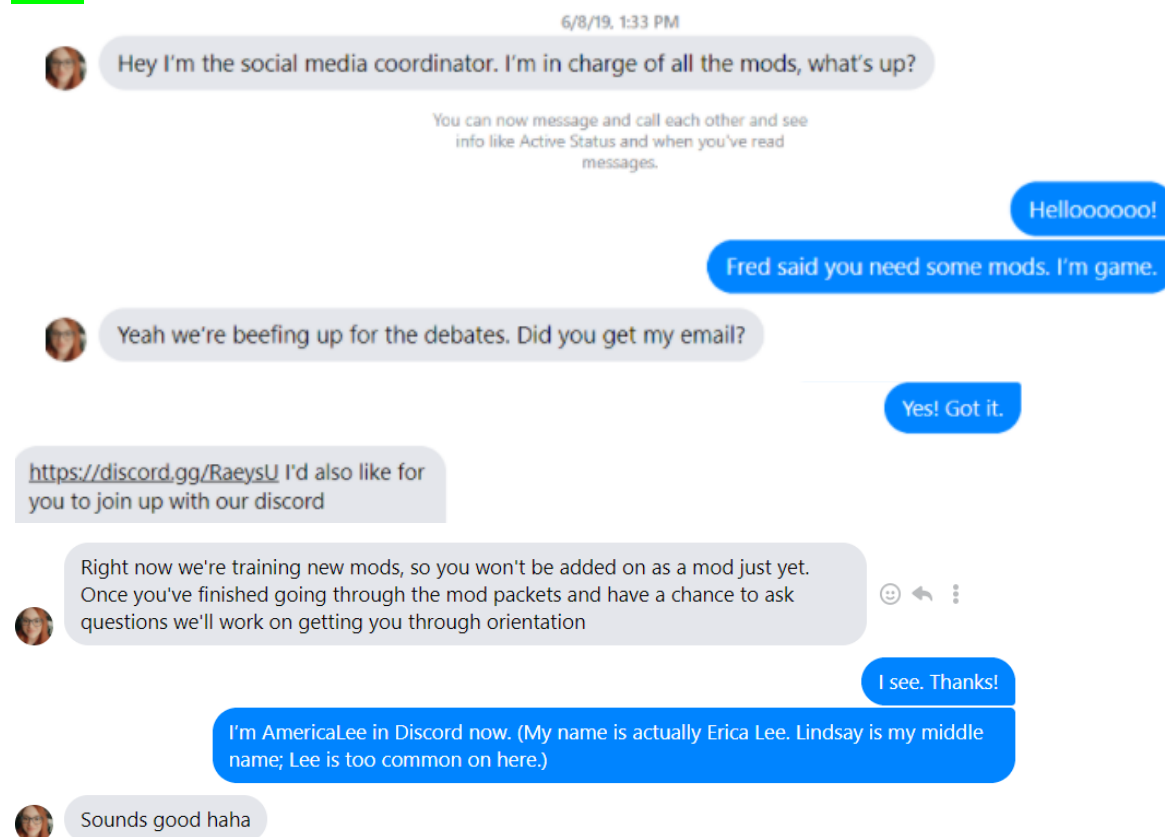


*At approximately 1:32pm PT: FOAY employee **Kaylee Jellesma**, Social Media Coordinator, sends an email to **Erica** with **onboarding information** to become a moderator for the Andrew Yang Basecamp Facebook group.

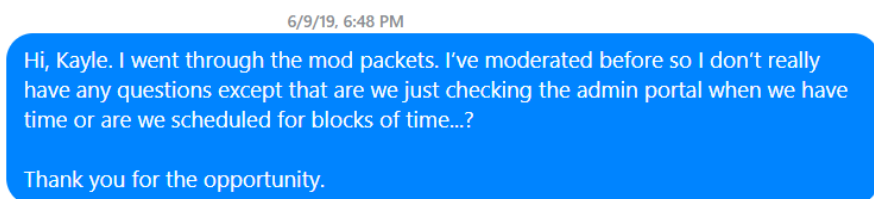


- June 8, 2019, continued -

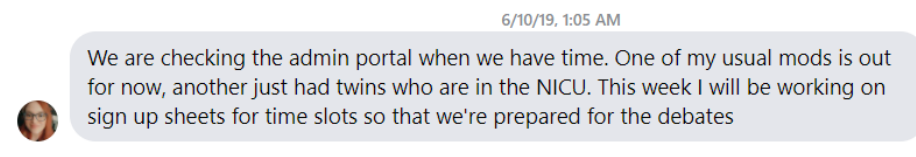
At approximately 1:33pm PT: Kayle Jellesma sends Facebook direct message to Erica.



*June 9, 2019, at approximately 6:48pm PT: Erica informs Kayle Jellesma she completed the onboarding requirements.



*June 10, 2019, at approximately 1:05am PT: Kayle Jellesma informs Erica that Kayle Jellesma will be working on the moderator schedule.






***From June 10, 2019, to June 25, 2019, Erica waits for a response from Kayle Jellesma.**

June 12, 2019, at approximately 8:03am, **Shaun Looney** posts recruitment announcement for Yang Gang Regional Organizers (YGRO) in the Yang 2020 Slack channel.



Shaun - Staff 8:03 AM, June 12th

@channel

Below is the PPT that was briefed during last night's Weekly Yang Gang Volunteer Livestream! If you're interested in organizing on a higher level and want to make big impact in your region then please apply to be a 
YANG GANG REGIONAL ORGANIZER  (check out slide 3 in the PPT 
) . We'll conduct interviews on a rolling basis so please apply soon.

https://docs.google.com/presentation/d/1EUiS3glaKMyfNu6TndKhsxQ-QZBXBenAx6ZHp9LKlJI/edit#slide=id.g546f4fbe89_0_0

Some of the responsibilities of this new role include:

1. Hosting a weekly zoom meeting with Yang Gang Leaders in your region to update them on campaign priorities, calls to action, and notable Yang Gang achievements
2. Meeting one-on-one with your Yang Gang Leaders to help them grow their Yang Gangs and to provide support as needed (can be done remotely)
3. Identifying key organizing opportunities in your region and developing a plan to mobilize your Yang Gangs to capitalize on them
4. Proposing solutions to problems that the campaign may be unaware of in your region

June 25, 2019, at approximately 8:20pm PT: **Erica** sends Facebook direct message to **Kayle Jellesma**.

6/25/19, 8:20 PM

Hi Katie,

Are you still needing mods for Basecamp? Thanks!

(Realizing it's busy at this moment so no rush to get back.)

At approximately 8:21pm PT: **Kayle Jellesma** replies to **Erica**.

6/26/19, 2:36 PM



We are looking for more mods, yes, but we reviewed some of the comments you've made on the campaign management and at the moment we are afraid that you may not be a good fit. Our campaign is unorthodox, but that's how we've gotten this far. I hope you understand our position on this.

- June 25, 2019, continued -

At approximately 8:23pm PT: Erica replies to Kayle Jellesma.

Which comments?

At approximately 8:24pm PT: Kayle Jellesma replies to Erica.



The comments regarding the campaign being composed of millennial's and your discussion with Fred about the female composition of the group. We are working on expanding our reach to female voters, it just so happens that the platforms where Andrew started gaining popularity were male dominated platforms. We are just now starting to expand to more female dominated arenas.

At approximately 8:25pm PT: Erica replies to Kayle Jellesma.

He said that was why I was offered to be a mod. The Basecamp group needs more moderation from women because it is so male heavy. When women speak up, they're piled on by many of the men.

At approximately 8:26pm PT: Kayle Jellesma replies to Erica.



The millennial comment was one on how the campaign is operating. We do want more mods, but we have made some drastic changes to the way that mods are interacting with the group. We are no longer allowing any debates with basecamp members, we are limiting the posts we allow through to keep things focused, comments responding to questions will be direct quotes from Andrew's policy pages.

June 28, 2019, at approximately 2:30pm PT: Erica responds to Kayle Jellesma.

6/28/19, 2:30 PM

The comments you reference were posted before I was offered the opportunity to moderate though, before you sent me the information to review. I don't know what changed.

Anyhow, thanks for the read and consideration. Hope you have a nice weekend.

June 29, 2019, at approximately 12:53am PT: **Kayle Jellesma** responds to **Erica**.

6/29/19, 12:53 AM

Erica, I appreciate how deeply you care about the basecamp and your desire to become a mod. You are incredibly dedicated to the cause, passionate, and ready to fight for this position. I have been doing this for a long while now, I have had many qualified people apply for this position in the past, but it ended up not being a good fit for them because at the time they did not realize what being a mod entails. Being a mod is not a glorifying position, you will be taunted, called names you can't even imagine, be threatened all while needing to maintain your composure and keep the basecamp in line. It is a thankless, difficult, and draining job that even my best mods have needed to take a break from. A lot of times people apply to this position believing that it is a direct line to Andrew himself and that they will be involved with policy and earth shattering projects related to the campaign.

I can tell you that is not the case. The mods and I are not here to make dramatic changes and we are not here to debate with basecampers. We are here to create and maintain a community that can distribute energies into projects that other members of the team have created, we set up watch parties, and encourage people to donate. We do the gritty, thankless, laborious work that most people are not involved with the campaign to do. I have gone through enough mods to tell pretty quickly when that is something people are going to be happy with doing. I don't think that you will be one of those people. I am not saying that your help is not needed, I am saying that knowing the changes you want to make to Andrew's campaign, you will quickly become frustrated with the limitations of the mod position. I hope this clarifies my original answer more than my previous response. I know you will do great work for the campaign, and encourage you to become more involved with the Women For Yang Facebook group as well as the team slack. Thank you so much for everything you've done.



July 3, 2019, at approximately 9:07pm PT: **Yang Gang Regional Organizer (YGRO) for Hawaii, Andi (Andrea) Duncan**, contacts **Erica** to interview her for YGRO position for **Washington State**.

Hi Erica Lee (Seattle, WA),

You have a new direct message from the **Yang 2020 Slack** workspace (yang-2020-slack.slack.com).

@Andi Duncan - YGRO (WA - OR - HI - AK) [View in the archives](#)



Andi Duncan - YGRO (WA - OR - HI - AK) 9:07 PM, July 3rd
Are you working with the Seattle Yang Gang folks?

July 6, 2019, at approximately 7:24pm PT: YGRO **Andi Duncan** contacts **Erica** to schedule an interview.

Hi Erica Lee (Seattle, WA),

You have a new direct message from the **Yang 2020 Slack** workspace (yang-2020-slack.slack.com).

@Andi Duncan - YGRO (WA - OR - HI - AK) [View in the archives](#)



Andi Duncan - YGRO (WA - OR - HI - AK) 7:24 PM, July 6th

Would you be free for a phone chat later tomorrow night? Like 8:30 pm PT? Or if not that Monday maybe 10 am PT? What's best phone number for you?

July 9, 2019: **Erica** has been hired as Yang Gang Regional Organizer (YGRO) for Washington State.

Hi Erica Lee - YGRO (Seattle - she/her),

mpdm-chelseawilkinson--andrea.s.duncan--ericalindsaylee-1 [View in the archives](#)



Andi Duncan - YGRO (WA-OR-HI-AK) (she/her) 12:07 AM, July 12th

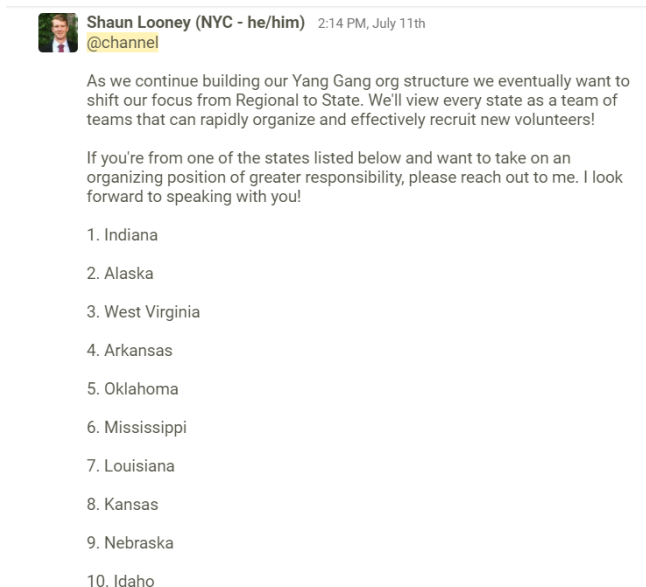
Now that we have Erica with us, let's set up this convo here so the three of us can talk about how we want to proceed together as a region. Chelsea, you said a next Tuesday call might work for you. Anything after 11 am PT works for me.



Chelsea Wilkinson (PDX) (she/her) 9:19 AM, July 12th

Yep! Tuesday would work :)

July 11, 2019, at approximately 2:14pm PT: FOAY employee **Shaun Looney** posts a recruitment announcement in the Yang 2020 Slack channel, asking volunteers to apply for **Yang Gang Regional Organizer, a position of “greater responsibility,”** asking for them to reach out to him.



July 12, 2019, at approximately 8:06pm PT: **Erica** echoes concerns raised by popular Seattle mayoral candidate Nikkita Oliver on her Facebook page about the problematic language regarding immigration on the Yang 2020 campaign website. **Esther Baldwin**, volunteer administrator for the Women for Yang Facebook group, **falsely accuses Erica** of sharing “propaganda,” that the language has never appeared on Yang’s campaign website.

***Esther Baldwin**, on May 20, 2019, was a volunteer.



- July 12, 2019, continued -

***Esther Baldwin** was FOAY staff from September 2019 - February 2020.



Esther Baldwin @FindYourSpine · Oct 14, 2019

...

Replying to @FindYourSpine and @AndrewYang

Why don't you head to the bottoms and spread the Yang love there.



1



Esther Baldwin @FindYourSpine · Oct 14, 2019

...

Replying to @cardano_bull and @AndrewYang

This is disgusting af. No one needs you to be a white savior to spread the Yang "gospel". You are headed to my hometown. They've been hearing about Yang from me long before "Fred the Felon" was ever on the scene. Show some fucking respect.



Esther Baldwin
@FindYourSpine

▼

Replying to @terrycrews

I can't help but wish that your momma would have swallowed you. You're a constant source of disgust and betrayal.

1:43 pm · 27 Aug 2020 · [Twitter for Android](#)



Andrea @WarriorWomen4Y · Oct 20, 2020

...

@Andrewyang @felon_fred @JoeBiden What is this???



Esther Baldwin @FindYourSpine · Oct 14, 2019

Replying to @cardano_bull and @AndrewYang

This is disgusting af. No one needs you to be a white savior to spread the Yang "gospel". You are headed to my hometown. They've been hearing about Yang from me long before "Fred the Felon" was ever on the scene. Show some fucking respect.



1



1



You're unable to view this Tweet because this account owner limits who can view their Tweets. [Learn more](#)



Andrea
@WarriorWomen4Y

...

Replying to @cardano_bull @AndrewYang and @JoeBiden

This is a tweet from Esther Baldwin to you in Oct, 2019. Did Esther harass you on other occasions?

7:16 PM · Oct 20, 2020 · [Twitter Web App](#)

EXHIBIT F

- July 12, 2019, continued -

Ms. Kara Ariail, partner at Holland & Knight, in her March 22, 2021, EEOC response, on page 2, repeats the same **false accusation** against **Erica**.

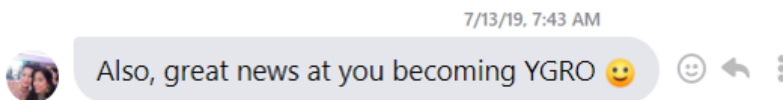
"For example, shortly after starting in her volunteer role, Charging Party promoted a **fake web page** on the Basecamp group, inferring falsely that FOAY supported an immigration policy that was contrary to Yang's actual policy and Humanity First message."

*If Ms. Ariail had bothered to take the time, she could have, and should have, been able to easily verify or disprove **Esther Baldwin**'s claim. There are active links that archive candidates' websites.

The screenshot below is a **true and accurate** representation of the statements from Andrew Yang's 2020 campaign website.



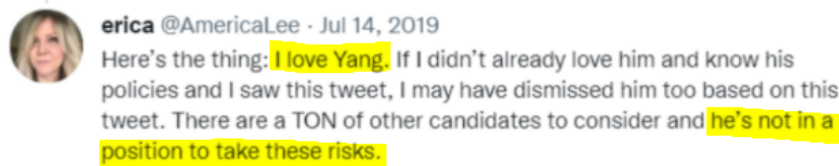
July 13, 2019: **Erica** reaches out to **Anaami P.**, volunteer administrator of the Women for Yang Facebook group, to discuss the situation because **Erica** is technically unable to send a direct message to volunteer administrator **Esther Baldwin** herself.



July 14, 2019, at approximately 11:41am PT: Respected journalist Soledad O'Brien tweets negatively against **Andrew Yang**.




Erica defends **Andrew Yang**, while acknowledging Soledad O'Brien's position.



August 20, 2019, at approximately 10:22am PT: Volunteer Twitter manager Shane Thrapp sends Twitter direct message to **Erica** to **invite her** to talk about joining the **campaign-authorized** @YangGangHub (now known as @HumanityForYang).



- August 20, 2019, continued -

 **Humanity for Yang** 🗨️🚀
@HumanityForYang

Hey.

Lol. You got time to talk about the Hub later?

Aug 20, 2019, 10:22 AM

Yup

Aug 20, 2019, 10:22 AM ✓

Honestly I've only been inviting a few in to make sure it works.
It seems to be, so I've got a list of people to invite in and you were already on it.

docs.google.com/document/d/1kq...

Read over that and we can connect later and chat when I get home and settled.

Aug 20, 2019, 10:27 AM

Ok. Thanks!

Aug 20, 2019, 10:27 AM ✓

Ok I read the handbook. I do most of that already.

Who is this, if I may ask? Shane?

Aug 20, 2019, 3:26 PM ✓

Yes

Aug 20, 2019, 4:49 PM

Should we set up a time to talk today?

I'm free now if you are.

Aug 21, 2019, 6:20 AM

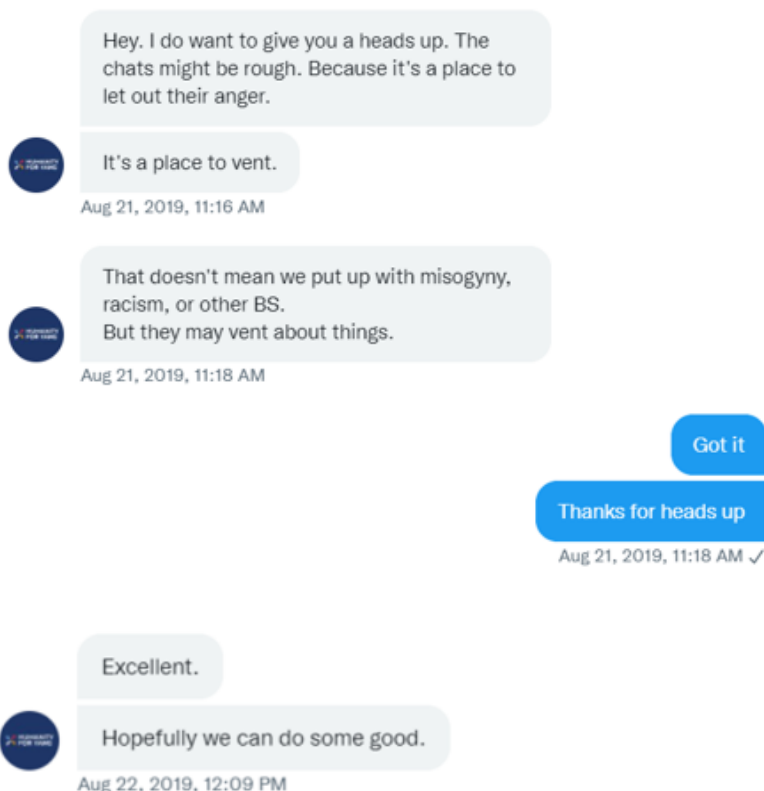
I'm free

916-316-2541

Aug 21, 2019, 6:34 AM ✓

August 21, 2019, at approximately 6:35am: Volunteer Twitter manager **Shane Thrapp** calls **Erica**; they discuss ways to improve Facebook Basecamp moderation against sexism and misogyny for **90 minutes** and about joining the @YangGangHub.

At approximately 11:16am PT: Volunteer Twitter manager **Shane Thrapp** follows up with **Erica** about joining the @YangGangHub.



August 22, 2019, at approximately 10:56am: Volunteer **Heidi Day** (Yang Vets) confronts **Esther Baldwin**, publicly online, as to why her post about sexism and misogyny in the campaign-sanctioned social media platforms was removed.



- August 22, 2019, continued -

Volunteer Heidi Day (WomenVets4Yang) posts her criticism of the sexism and misogyny in the Facebook Basecamp group on Twitter publicly.

Andrew Yang... · 8/22/19 ...
I'm not the only one who has looked at the numbers and concluded that the economy has stopped working for most people. Ray Dalio says we need to declare a national emergency. Jamie Dimon says we need a Marshall Plan to rebuild the US and a negative income tax. The data is clear.

Heidi, Veterans... · 8/22/19 ...
Gonna address your #yangbros problem in Basecamp? Remember what Bernie Bros did for Bernie in 2015?

Heidi, Veterans... · 8/22/19 ...
Then Yang needs to nip it in the bud by setting a better tone in his official group where misogyny is running rampant and unchecked.

WomenVets4Yang @YangVets4 · 9h
It's not only one guy. I have lost interest in reading the group at all anymore because it's so many. I just tried to engage one guy and help him understand his behavior and .. well I learned today.

Pray for the Amazon · 9h
I would never engage with people like that. It never ends well. The best that can be hoped for is others who agree with you are encouraged. But misogynistic attitudes are so widespread, I just gave up talking about them for the most part tbh. I just alert and hope for the best.

WomenVets4Yang @YangVets4 · 9h
Idk, where there's smoke there's fire. His base is 70% male and women are leaving Basecamp in droves. I am having a hard time getting women onboard (and he needs us!) Because of it.

Pray for the Amazon · 9h

Pray for the Amazon · 9h
My advice is just stay away from Facebook. The enforcement of rules there is pretty much non-existent so trolls are much worse. Twitter group is much better - I haven't seen a single instance of that here.

I suggest reaching out to Zach - hopefully he can replace the admin.

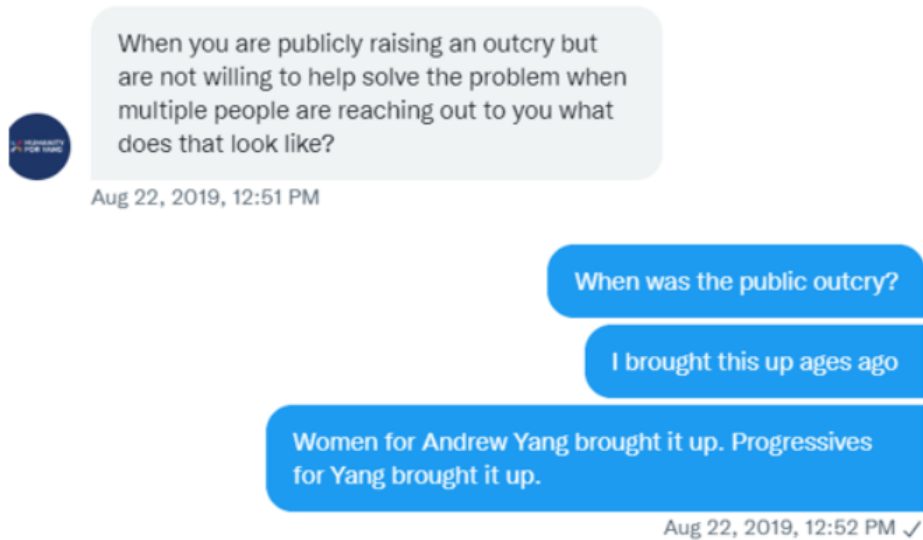
WomenVets4Yang @YangVets4 · 9h
Literally fb had me in tears and switching to Marianne lol. I feel better now having talked to the #yanggang of Twitter.

YangMobile · 4m
@WomenforYang

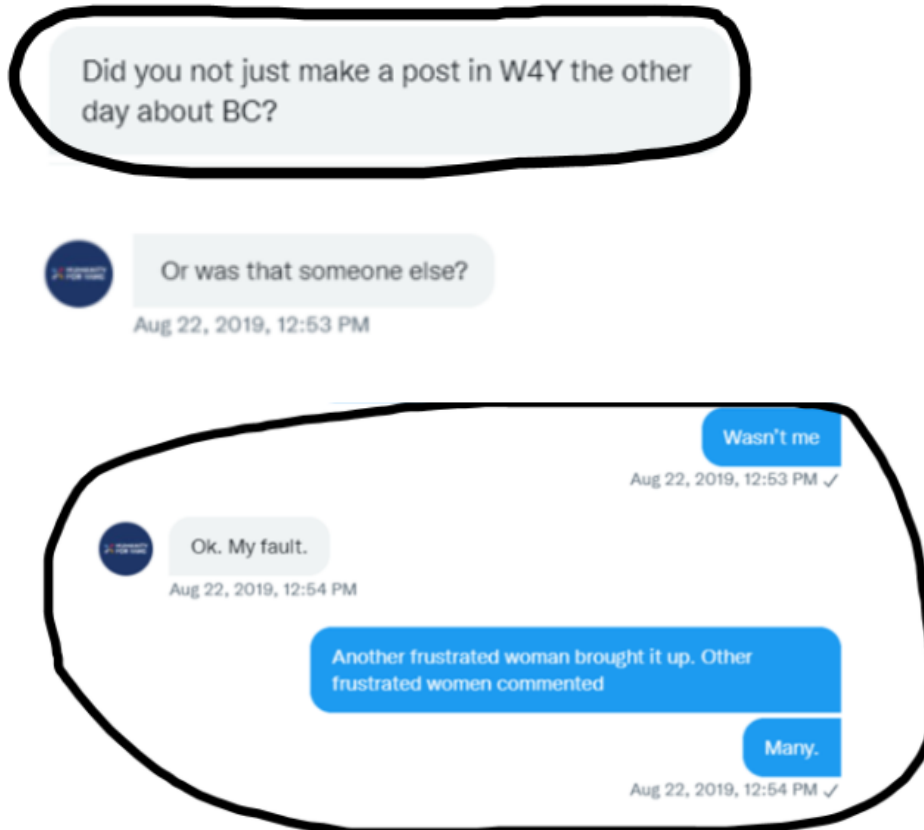
WE SUMMON THEE!

- August 22, 2019, continued -

At approximately 12:51pm PT: Shane Thrapp, accuses Erica of “publicly raising an outcry.”



(Note for reader: “W4Y” is the Women for Yang Facebook group, and “BC” is “Facebook Basecamp.”)



- August 22, 2019, continued -

Evidently, Shane Thrapp had seen the online confrontation between Heidi Day and Esther Baldwin and assumed, falsely, that Erica was involved.

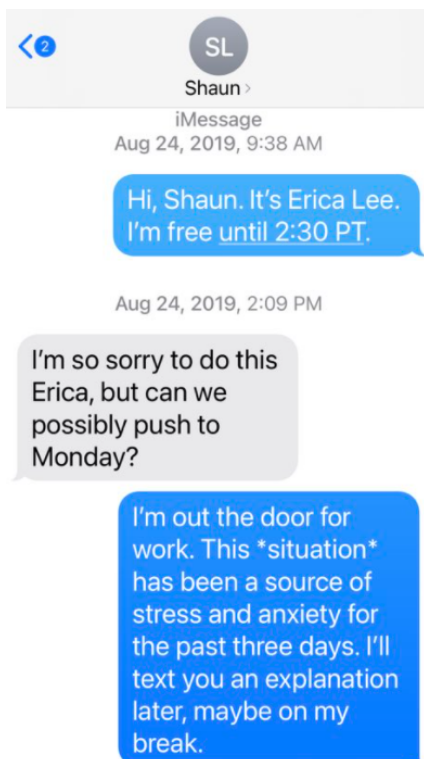
"Wasn't me." -Erica

"Ok. My fault." -Shane

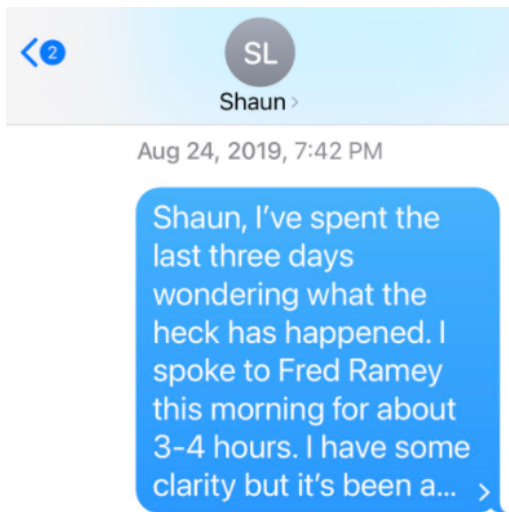
August 24, 2019, at approximately 1:47am: Shane Thrapp sends message to Erica that states, "Your issue is being looked at by the campaign."



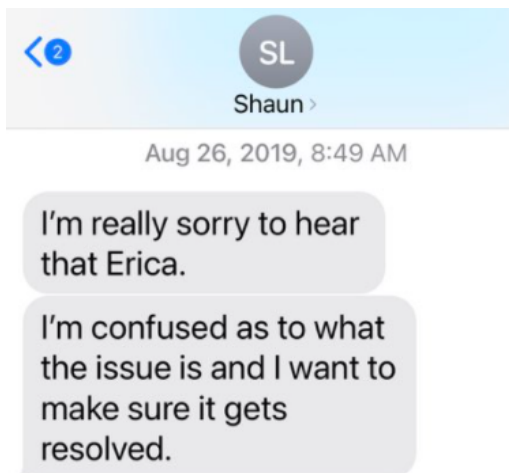
At approximately 9:38am PT: FOAY employee Shaun Looney, Distributed Organizing Director, sends Erica a Slack message to ask for a call. Shaun Looney provides the following number: ([REDACTED]).



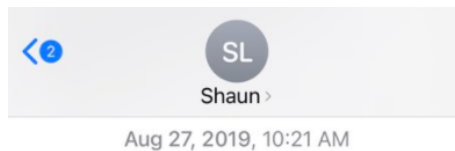
- August 24, 2019, continued -



August 26, 2019, at approximately 8:49am: **Shaun Looney** responds to **Erica**.



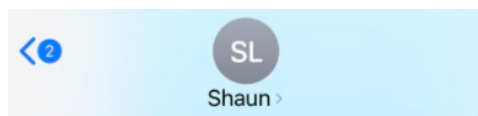
August 27, 2019, at approximately 10:21am PT: Erica responds via text to FOAY employee Shaun Looney regarding the ongoing harassment.



Aug 27, 2019, 10:21 AM

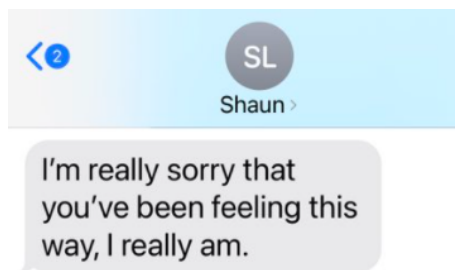
Hi, Shaun. Took a day off from this. Apologies for the late reply.

The issue is that one time back in June, I pointed out the sexism and lack of women in the Basecamp group and since then, anytime Morgan, et al, see something I say on the topic, they take the info back into the group and talk about me for hours.

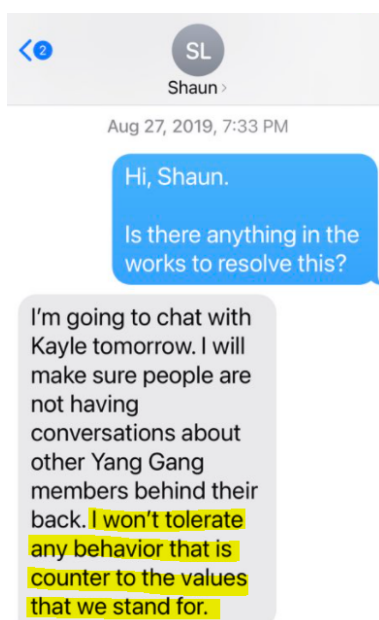


Tangential to that, last Tuesday, Shane and I connected to talk about me becoming part of the Hub because he said he really wanted my voice and feedback as part of the group considering my unique experience and past concerns. We also talked about how to make Basecamp better. He said the mod group is unhappy and that whenever Someone criticizes them, they take it very personally. It was a good talk.

- August 27, 2019, continued -



At approximately 7:33pm PT: Erica texts FOAY employee Shaun Looney after no follow-up provided.



September 9, 2019, as there has been no communication and no resolution to Erica's complaints since August 27, 2019, Erica sends email at approximately 7:42pm PT to FOAY employee Shaun Looney. No response from Shaun Looney.

***From August 27, 2019, to September 25, 2019 (29 days), no communication from Shaun Looney.**